

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

CIVIL ACTION NO: 0:22-1505-SAL

MAQUITA HINSON,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	<b>DEFENDANTS FOOD LION, LLC AND</b>
	)	<b>DELHAIZE AMERICA, LLC'S</b>
FOOD LION, LLC, d/b/a FOOD LION, and	)	<b>ANSWERS TO LOCAL RULE 26.01</b>
DELHAIZE AMERICA, LLC, d/b/a FOOD	)	<b>INTERROGATORIES</b>
LION,	)	
	)	
Defendant.	)	

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The Defendant, Food Lion, LLC, answers the Court's Local Rule 26.01, D.S.C.

Interrogatories as follows:

**(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

**Answer:** Defendant is not aware of any such parties.

**(B) As to each claim, state whether it should be tried jury or non-jury and why.**

**Answer:** Defendants submit that Plaintiff's claims are legal in nature and should be tried to a jury.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

**Answer:** Defendant Food Lion, LLC, is a wholly owned subsidiary of Delhaize America, LLC, 81.86% membership interests of which are owned by Lion US Participations S.à r.l., Luxembourg company and 18.14% membership interests of which are owned by Delhaize The Lion America, LLC, Delaware Limited Liability Company.

Delhaize America, LLC is not publicly owned. It is an indirect wholly owned subsidiary of Koninklijke Ahold Delhaize N.V., the ultimate parent company of the organization, which is a Dutch publicly traded company.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

**Answer:** The plaintiff filed this action in the Court of Common Pleas for York County, South Carolina, and it was removed to this Court.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?**

**Answer:** It is not.

**(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

**Answer:** Defendants are properly identified.

**(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

**Answer:** Defendants make no such contention at this time and specifically reserve the right to amend this response during the course of discovery.

**<Signature Page to Follow>**

TURNER, PADGET, GRAHAM & LANEY, P.A.

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ATTORNEYS FOR DEFENDANTS

May 11, 2022